

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

JACOB PARLIN

Defendant.

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Case No. 1:21-CR-10350-LTS-10

MOTION TO REOPEN DETENTION HEARING

NOW COMES the Defendant, Jacob Parlin, by and through counsel, Paul Garrity, and respectfully moves this Court to reopen his detention hearing to consider his release to a long term residential substance abuse treatment program.

In support of this motion, the Defendant states as follows:

1. On December 29, 2021 the Defendant was ordered detained, after a detention hearing, by Magistrate Judge Rich of the United States District Court for the District of Maine, Docket No. 2: 21-MJ-00324-JHR. The Defendant had been arrested in the District of Maine on the above captioned indictment and was subsequently transferred to the District of Massachusetts. The Defendant made his initial appearance before this Court on January 12, 2022 and Magistrate Judge Dein adopted the detention order issued by the District of Maine.
2. The Defendant has been dealing with a long-term substance abuse issue and has been seeking treatment to deal with this issue. His current place of detention, Wyatt Detention Center, offers little programing on this issue to federal pretrial detainees like the Defendant.
3. The Defendant has been screened and accepted into two long-term residential programs in Maine (see attached acceptance letters). It is the undersigned counsel's understanding that

the programs, Layman Way Recovery Center and Milestone Recovery, are both up to 6-months in length and provide programming that would assist the Defendant in dealing with his substance abuse issue.

4. The Defendant is requesting that this Court re-open his detention hearing and consider releasing him into one of the two above listed programs.
5. The undersigned counsel has consulted with the probation department regarding the proposed release plan into a long-term substance abuse treatment program and has been informed by United State's Probation Officer Tricia Marcy that the probation office would continue to recommend detention despite the Defendant's acceptance into the above listed treatment programs.
6. The undersigned counsel has attempted to contact AUSA Nadine Pellegrini to obtain her position but was notified that AUSA Pellegrini is on leave from November 18, 2022 through November 28, 2022. Nevertheless, based upon the undersigned counsel's prior discussions with AUSA Pellegrini it is the undersigned counsel's understanding that AUSA Pellegrini would object to this motion.

WHEREFORE, the Defendant respectfully requests that this Honorable Court reopen the Defendant's detention hearing and release him to one of the above two listed long-term residential substance abuse programs.

Respectfully submitted,
Jacob Parlin,
By his Attorney,

Date: November 23, 2022

/s/ Paul J. Garrity
Paul J. Garrity
Bar No. 555976
14 Londonderry Road

Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 23rd day of November, 2022, a copy of the within Motion was e-filed for all parties involved.

Date: November 23, 2022

/s/ Paul J. Garrity
Paul J. Garrity